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August 8, 2022

By ECF and Email

Hon. Robert W. Lehrburger
United States Magistrate Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312
By email to: Lehrburger_NYSDChambers@nysd.uscourts.gov

GRANTED.


Robert W. Lehrburger, USMJ
Aug. 9, 2022

Re: *United States v. Tavaughn Oddman*, 22-mj-1052 (UA) – Request to Modify Conditions of Bail

Dear Judge Lehrburger:


I represent Tavaughn Oddman in the above-referenced case. I am writing to request a modification of the conditions of Mr. Oddman's bail to permit him to work a night shift from midnight to 8:00 a.m. (ECF Doc. No. 8). Both the government and Pretrial Services have no objection to this request.

Mr. Oddman was released on bail in March 2020 with conditions including home detention with electronic monitoring. He has not been indicted.

Mr. Oddman was recently offered a job by a former employer, Mercury Facility Services Inc. d/b/a Hospitaliteam NYC. The job would require Mr. Oddman to work a night shift from midnight to 8:00 a.m. Under the current conditions of his release, Mr. Oddman must be at home in the early morning hours. Accordingly, we are respectfully requesting a modification of Mr. Oddman's conditions of release to permit him be away from the location of his pretrial supervision to work a night shift for Mercury Facility Services Inc.

Thank you for your attention to this matter.

Respectfully submitted,


Zachary S. Taylor

cc: Rushmi Bhaskaran, Esq.
Assistant United States Attorney (*by ECF*)
Ashley Cosme,
Pretrial Services Officer (*by e-mail*)